UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE PET FOOD PRODUCTS LIABILITY LITIGATION	:	CASE NO. MDL Docket No. 1850 (All Cases)
	:	Case No. 07-2867 (NLH)
	:	Judge Noel L. Hillman
	:	**DECLARATION OF THOMAS ROBINSON OF DEFENDANT THE IAMS COMPANY IN SUPPORT OF DEFENDANTS' MOTION TO ADOPT THE RETRIEVAL PLANS FOR ORGANIZED RECALLED PRODUCT THAT WERE RECOMMENDED BY DEFENDANTS' EXPERT**

STATE OF OHIO)
) SS:
COUNTY OF WARREN)

Thomas Robinson, being first sworn upon oath, says:

1. I am the Regional Category Quality Assurance Leader of Defendant The Iams Company ("Iams"). I am making this Declaration based upon personal knowledge and am competent to testify to the matters stated below.

2. In my position as Regional Category Quality Assurance Leader for Iams, my duties and responsibilities include, among other things, storing, maintaining, inventorying and organizing all the recalled pet food and tracking the quantity of recalled food.

3. For almost one year, Iams has been storing 593,293 cases of recalled product that is organized by product type or SKU and date of manufacture (collectively, the "SKU date"). Iams has cases of product for 367 SKU dates that are stacked on full or partial

Exhibit G to
Retrieval Motion

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pallets. Most pallets are wrapped with heavy plastic. All the product is stored at a rental warehouse located in Sioux City, Iowa and named the Bekins Warehouse.

4. The organized recalled pet food was produced for Iams by Menu Foods, which was directed to use a process that produced pet food in a uniform and systematic manner. I understand that the process of mixing each batch of raw ingredients was designed to ensure uniformity within batches and to minimize variability among batches. In our experience, any variation among different batches is very small, less than 0.5%. Uniformity within and among batches is essential to Iams and is necessary to produce consistent quality pet food.

5. I understand that counsel for Plaintiffs have requested Iams and other Defendants to randomly select cases from within 125 pallets per SKU date, where available. To determine the time and cost involved with implementing Plaintiffs' proposal, I asked employees of Iams to physically deconstruct a full pallet in the Bekins Warehouse and choose designated cases from within the pallet. The employees selected a full pallet, unwrapped the plastic around it, deconstructed the cases, retrieved the identified cases from within the unwrapped pallet, then restacked the cases and resealed the pallet. Reconstructing and resealing the pallet is necessary to move the pallet safely and avoid the danger of cases falling off the pallet.

6. The process of breaking down and reconstructing one pallet took 45 minutes. This time commitment does not include time for administrative paperwork and for moving the restacked and resealed pallet from its stored location to the staging area for deconstruction.

7. Iams only has the space in its warehouse to deconstruct 4 pallets at a time. Assuming Iams hired the dedicated labor to deconstruct 4 pallets at the same time for eight hours

per day, I estimate it would take Iams over 4 months to execute Plaintiffs' proposal for Iams' 5,500 pallets.

8. I have reviewed the retrieval plans set forth by Dr. George P. McCabe in his Declaration in Support of Defendants' Retrieval Plans for Organized Recalled Product. I understand his plans and believe that selecting cases from the top of each of Iams' pallet would take approximately three minutes per pallet. Iams would be able to slit open the top of the pallet, retrieve the required number of cases, and send the remainder for disposal.

Thomas Robinson

Sworn to and subscribed in my presence by the said Thomas Robinson, this 7 day of March 2008.

Notary Public

DEBORAH J. JOHNSON
Notary Public, State of Ohio
My Commission expires: My Commission Expires 12-25-2011

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